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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH WONG,

Defendant.

No. 2:23-cr-00596-RGK

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

**CURRENT TRIAL DATE:** 3-25-2025  
**PROPOSED TRIAL DATE:** 11-18-2025

Plaintiff United States of America, by and through its counsel of record, the Acting United States Attorney for the Central District of California and Assistant United States Attorneys Nisha Chandran, Maxwell Coll, and Alexander S. Gorin, and defendant JOSEPH WONG ("defendant WONG"), both individually and by and through his counsel of record, Jesse Ruiz, hereby stipulate as follows:

1           1.     The Indictment in this case was filed on December 6, 2023.  
2 Defendant first appeared before a judicial officer of the court in  
3 which the charges in this case were pending on January 27, 2025. The  
4 Speedy Trial Act, 18 U.S.C. § 3161, originally required that the  
5 trial commence on or before April 7, 2025. Co-defendant Hailong Zhu  
6 remains a fugitive. Plea agreements have been filed as to co-  
7 defendants Justin Walker and Lu Zhang. (See Dkts. 64, 72.)

8           2.     On January 27, 2025, the Court set a trial date of March  
9 25, 2025.

10          3.     Defendant WONG is released on bond pending trial. The  
11 parties estimate that the trial in this matter will last  
12 approximately five days. All defendants are joined for trial and a  
13 severance has not been granted.

14          4.     By this stipulation, defendant moves to continue the trial  
15 date to November 18, 2025. This is the first request for a  
16 continuance as to defendant WONG.

17          5.     Defendant requests the continuance based upon the following  
18 facts, which the parties believe demonstrate good cause to support  
19 the appropriate findings under the Speedy Trial Act:

20               a.     Defendant is charged with a violations of Conspiracy  
21 to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h);  
22 Concealment Money Laundering, in violation of 18 U.S.C.  
23 § 1956(a)(1)(B)(i); and International Money Laundering, in violation  
24 of 18 U.S.C. § 1956(a)(2)(B)(i). Upon entry of a protective order as  
25 to defendant Wong, the government will produce discovery to the  
26 defense, including thousands of pages of financial documents,  
27 photographs, videos, electronic messages, and written reports, among  
28

1 other files. The government will produce additional discovery as it  
2 becomes available.

3 b. Defense counsel for defendant WONG is presently  
4 scheduled to be in trial as described in Appendix A. Accordingly,  
5 counsel represents that he will not have the time that he believes is  
6 necessary to prepare to try this case on the current trial date.

7 c. In light of the foregoing, counsel for defendant also  
8 represents that additional time is necessary to confer with  
9 defendant, conduct and complete an independent investigation of the  
10 case, conduct and complete additional legal research including for  
11 potential pre-trial motions, review the discovery and potential  
12 evidence in the case, and prepare for trial in the event that a  
13 pretrial resolution does not occur. Defense counsel represents that  
14 failure to grant the continuance would deny him reasonable time  
15 necessary for effective preparation, taking into account the exercise  
16 of due diligence.

17 d. Defendant believes that failure to grant the  
18 continuance will deny him continuity of counsel and adequate  
19 representation.

20 e. The government does not object to the continuance.

21 f. The requested continuance is not based on congestion  
22 of the Court's calendar, lack of diligent preparation on the part of  
23 the attorney for the government or the defense, or failure on the  
24 part of the attorney for the Government to obtain available  
25 witnesses.

26 6. For purposes of computing the date under the Speedy Trial  
27 Act by which defendant's trial must commence, the parties agree that  
28 the time period of March 25, 2025, to November 18, 2025, inclusive,

1 should be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A),  
2 (h)(7)(B)(i) and (h)(7)(B)(iv) because the delay results from a  
3 continuance granted by the Court at defendant's request, without  
4 government objection, on the basis of the Court's finding that: (i)  
5 the ends of justice served by the continuance outweigh the best  
6 interest of the public and defendant in a speedy trial; (ii) failure  
7 to grant the continuance would be likely to make a continuation of  
8 the proceeding impossible, or result in a miscarriage of justice; and  
9 (iii) failure to grant the continuance would unreasonably deny  
10 defendant continuity of counsel and would deny defense counsel the  
11 reasonable time necessary for effective preparation, taking into  
12 account the exercise of due diligence.

13 7. Nothing in this stipulation shall preclude a finding that  
14 other provisions of the Speedy Trial Act dictate that additional time  
15 periods be excluded from the period within which trial must commence.  
16 Moreover, the same provisions and/or other provisions of the Speedy  
17 Trial Act may in the future authorize the exclusion of additional  
18 time periods from the period within which trial must commence.

19 IT IS SO STIPULATED.

20 Dated: March 10, 2025

Respectfully submitted,

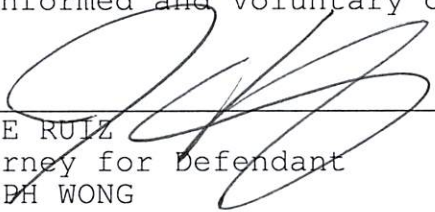
21 JOSEPH T. MCNALLY  
22 Acting United States Attorney

23 DAVID T. RYAN  
24 Assistant United States Attorney  
Chief, National Security Division

25 /s/  
26 ALEXANDER S. GORIN  
Assistant United States Attorney

27 Attorneys for Plaintiff  
28 UNITED STATES OF AMERICA

1 I am JOSEPH WONG'S attorney. I have carefully discussed every  
 2 part of this stipulation and the continuance of the trial date with  
 3 my client. I have fully informed my client of his Speedy Trial  
 4 rights. To my knowledge, my client understands those rights and  
 5 agrees to waive them. I believe that my client's decision to give up  
 6 the right to be brought to trial earlier than November 18, 2025, is  
 7 an informed and voluntary one.

8   
 9 \_\_\_\_\_  
 10 JESSE RUIZ  
 Attorney for Defendant  
 JOSEPH WONG

03.07.2025  
 \_\_\_\_\_  
 Date

11 I have read this stipulation and have carefully discussed it  
 12 with my attorney. This agreement has been read to me in Mandarin, the  
 13 language I understand best, and I have carefully discussed every part  
 14 of it with my attorney. I understand my Speedy Trial rights. I  
 15 voluntarily agree to the continuance of the trial date, and give up  
 16 my right to be brought to trial earlier than November 18, 2025. I  
 17 understand that I will be ordered to appear in Courtroom 850 of the  
 18 Roybal Federal Building and U.S. Courthouse, 255 East Temple Street,  
 19 Los Angeles, California on November 18, 2025, at 9:00 a.m.

20   
 21 \_\_\_\_\_  
 22 JOSEPH WONG  
 Defendant

03.07.2025  
 \_\_\_\_\_  
 Date

**CERTIFICATION OF INTERPRETER**

23 I, Stacy Li, am fluent in the written and spoken English  
 24 and Mandarin languages. I accurately translated this entire  
 25 agreement from English into Mandarin to defendant WONG on this date.

26 Stacy Li  
 27 \_\_\_\_\_  
 28 INTERPRETER

03/10/2025  
 \_\_\_\_\_  
 Date